

BURSOR & FISHER, P.A.
Neal J. Deckant (State Bar No. 322946)
1990 North California Blvd., 9th Floor
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Email: ndeckant@bursor.com

GEORGE FELDMAN MCDONALD, PLLC

Lori G. Feldman (*pro hac vice*)
Michael Liskow (State Bar No. 243899)
200 Park Avenue, Suite 1700
New York, New York 10166
Telephone: (646) 354-6534
E-mail: lfeldman@4-justice.com
mliskow@4-justice.com

*Attorneys for Plaintiff
Additional Attorneys on Signature Page*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILINGS CASES

Master File No. 5:22-cv-07557-PCP (V рд)

This document relates to:

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

All actions

The Honorable P. Casey Pitts
Courtroom 8, 4th Floor

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** pursuant to Northern District of California Civil Rule
 3 Local Rules 7-11 and 79-5, and the protective order issued in the case (Dkt. No. 74), Plaintiffs
 4 hereby move the Court for an order allowing them to file under seal excerpts and quotations from
 5 documents containing information designated by Defendant Meta Platforms (“Meta”) as either
 6 Confidential or Highly Confidential – Attorney’s Eyes Only, and submitted by Plaintiffs in support
 7 of their Reply in Support of Motion for Class Certification. Plaintiffs state that the “compelling
 8 reasons” standard applies. *See Zheng-Lawson v. Toyota Motor Corp.*, 2019 WL 3413253, at *2-3
 9 (N.D. Cal. July 29, 2019). Plaintiffs submit this request only to comply with their obligations
 10 under Local Rule 79-5 and the protective order issued in the case, and Plaintiffs take no position at
 11 this time on the propriety of Meta’s confidentiality designations, or whether they meet the
 12 compelling reasons test for retaining confidentiality. As to Plaintiffs’ expert reports, the reports
 13 cite information throughout designated by Meta as either Confidential or Highly Confidential –
 14 Attorney’s Eyes Only by Meta.

15 Plaintiffs propose that the following materials designated as either Confidential or Highly
 16 Confidential – Attorney’s Eyes Only by Meta should be sealed:

Document	Portions of Documents to be Sealed
Plaintiffs’ Reply in Support of Class Certification (“Reply”)	Page 8: lines 5-6 Page 11: lines 2-3, 14-16
Ex. 1 to Deckant Declaration in Support of Reply (<i>Meta Letter</i>)	Entirely Under Seal
Ex. 2 to Deckant Declaration in Support of Reply (30(b)(6) <i>Deposition Transcript</i>)	Page 49: lines 12-20, 25 Page 124: lines 1-5, 8-11, 13, 19-21, 23 Page 125: lines 11, 15-16, 18, 22-25
Ex. 3 to Deckant Declaration in Support of Reply (<i>Wooldridge Deposition Transcript</i>)	Entirely Under Seal
Ex. 4 to Deckant Declaration in Support of Reply (<i>Zeidman Reply Report</i>)	Entirely Under Seal
Plaintiffs’ Opposition to Defendant’s Daubert Motion to Strike or Exclude the Opinions of	Page 2: lines 13-14 Page 3: lines 5, 11, 13-15

1 Plaintiff's Expert Colin B. Weir ("Opp. to Weir Daubert")	
2 Ex. 1 to Liskow Decl. in Support 3 of Opp. to Weir Daubert (<i>Weir</i> 4 <i>Deposition Transcript</i>)	Page 112: lines 7-8, 20 Page 125: lines 11-15 Page 126: lines 20-21
5 Plaintiffs' Opposition to 6 Defendant's Motion to Exclude 7 the Expert Report and Testimony 8 of Robert Zeidman ("Opp. to 9 Zeidman Daubert")	Page 2: lines 4-6 Page 5: lines 3-5, 7-13, 27-28 Page 6: lines 3-4, 17-23 Page 7: lines 4-10, 12-15 Page 8: lines 18-20 Page 9: lines 14-21, 23-28 Page 10: lines 1-3, 12-14 Page 11: lines 2-6 Page 12: lines 6-9, 13-17, 21-26 Page 13: lines 9-11, 15-21, 23, 28 Page 14: lines 1, 3-4, 21-25 Page 15: lines 11-16, 20-24 Page 16: lines 23 Page 17: lines 2, 12-14 Page 18: lines 1 Page 19: lines 1-28 Page 20: lines 1-5 Page 21: lines 10, 18-26 Page 22: lines 15-18, 20-28 Page 23: lines 1
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17 Ex. A to Baxter-Kauf Decl. in 18 Support of Opp. to Zeidman 19 Daubert (<i>Zeidman Deposition</i> 20 <i>Transcript</i>)	Page 67: lines 21-22 Page 68: lines 3-9, 13-16, 24-25 Page 71: lines 24 Page 72: lines 4, 7 Page 76: lines 1-4 Page 77: lines 8-9 Page 93: lines 5 Page 146: lines 1-3, 5-6, 8-9, 11-13, 15-19
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23 Ex. B to Baxter-Kauf Decl. in 24 Support of Opp. to Zeidman 25 Daubert (<i>Zervas Deposition</i> Transcript)	Entirely Under Seal
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1 Dated: December 15, 2025

GEORGE FELDMAN MCDONALD, PLLC

2 By: /s/ Michael Liskow
Michael Liskow

3
4 Lori G. Feldman (*pro hac vice*)
5 Michael Liskow (State Bar No. 243899)
102 Half Moon Bay Drive
Croton-on-Hudson, NY 10520
Telephone: (917) 983-9321
E-mail: lfeldman@4-justice.com
mliskow@4-justice.com

6
7 **BURSOR & FISHER, P.A.**

8 Neal Deckant (State Bar No. 322946)
9 1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
10 Telephone: (925) 300-4455
Facsimile: (925) 407-2700
Email: ndeckant@bursor.com

11
12 **SMITH KRIVOSHEY, P.C.**

13 Joel D. Smith (State Bar No. 244902)
867 Boylston Street, 5th Floor
Boston, MA 02216
Telephone: 617-377-7404
Email: joel@skclassactions.com

14
15 **GEORGE FELDMAN MCDONALD, PLLC**

16 Rebecca A. Peterson (State Bar No. 241858)
1650 West 82nd Street, Suite 880
Bloomington, MN 55431
Telephone: (612) 778-9595
Facsimile: (888) 421-4173
E-mail: rpeterson@4-Justice.com

17
18 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

19 Kate M. Baxter-Kauf (*pro hac vice*)
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
20 Telephone: (612) 339-6900
Facsimile: (612) 339-0981
E-mail: kmbaxter-kauf@locklaw.com

21
22 **THE HODA LAW FIRM, PLLC**

23 Marshal J. Hoda, Esq. (*pro hac vice*)
12333 Sowden Road, Suite B
Houston, TX 77080
24 Telephone: (832) 848-0036
Email: marshal@thehodalawfirm.com

25
26 **FOSTER YARBOROUGH PLLC**

27 Patrick Yarborough, Esq. (*pro hac vice*)
917 Franklin Street, Suite 220
Houston, TX 77002

1 Telephone: (713) 331-5254
2 Email: patrick@fosteryarborough.com

3 **EMERSON FIRM, PLLC**
4 John G. Emerson (*pro hac vice*)
5 2500 Wilcrest, Suite 300
6 Houston, TX 77042
7 Telephone: (800) 551-8649
8 Email: jemerson@emersonfirm.com

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Attorneys for Plaintiffs